

UNITED STATES DISTRICT COURT

for the
District of New Mexico

United States of America

v.

Jeremy Richard SENA
Jessi TRUJILLO

Kenlee

len

Defendant

Case No. **21-MJ-19**

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 01/04/2021 in the county of Otero in the _____ District of

New Mexico, the defendant violated 21 U. S. C. § 841(a)(1)

x an offense described as follows:

21USC841(a)(1) - Knowingly and intentionally possess with the intent to distribute a controlled substance, to wit: approximately 101.500 grams of methamphetamine, a schedule I substance. (Jessi TRUJILLO).

21USC841(a)(1) - Knowingly and intentionally possess with the intent to distribute a controlled substance, to wit: approximately 77.500 grams of methamphetamine, a schedule I substance. (Jeremy Richard SENA).

This criminal complaint is based on these facts:

See attached Affidavit, which is marked Attachment "A", and which is incorporated by reference as if fully set out herein.

☒ Continued on the attached sheet.

[Signature]
Complainant's signature

Lorenzo Trevizo, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/06/2021

[Signature]
Judge's signature

City and state: Las Cruces, NM

Carmen Garza, Magistrate Judge

Printed name and title

Attachment A

I, Lorenzo Trevizo, Affiant, being duly sworn, state that the following information is true and correct to the best of my knowledge and belief:

The following information is based upon information provided to me by other agents and is presented as probable cause to arrest Jeremy Richard SENA and Jessi TRUJILLO. Since this affidavit is being submitted for the limited purpose of establishing probable cause, your Affiant has not included each and every known fact regarding this investigation. More specifically, your Affiant has set forth only pertinent facts that your Affiant believes are necessary to establish probable cause.

On January 3, 2021, Agent Carlos M. Guillen was conducting primary inspection duties at the United States Border Patrol checkpoint located on Highway 70, west of Alamogordo, New Mexico. At approximately 2200 hours, a black 2015 Buick Lacrosse bearing New Mexico license plate ALDS00 entered the checkpoint for inspection. Agent Guillen greeted the driver and passenger, later identified as TRUJILLO, Jessi Renee (DOB: 06/11/1985 COC/COB: United States) and SENA, Jeremy (DOB: 10/17/1987 COC/COB: United States). After Agent Guillen finished his greeting, he asked where they were headed to. The driver, TRUJILLO, advised they were headed over to Roswell and coming from Las Cruces. As Agent Guillen looked into the back seat area he noticed there was no luggage and it was extremely clean. Agent Guillen then asked if he could look at the trunk space, to which the driver, TRUJILLO, gave consent. At that moment, Agent GUILLEN noticed that the driver TRUJILLO was struggling to open the trunk and did not know where to open it from. Agent Guillen asked if the vehicle belonged to the driver TRUJILLO. TRUJILLO looked confused and turned to look at the passenger, SENA, and slowly replied it belonged to a friend. Agent Guillen then asked for consent to do a K-9 inspection, to which TRUJILLO consented. The vehicle was then sent to secondary for further inspection.

In the secondary inspection area, Agent Weems asked for and received consent from TRUJILLO to conduct a canine inspection of the Buick. After all visible occupants of the Buick were removed, Agent Weems and canine Rex conducted a canine inspection of the Buick. Canine Rex displayed an alert on the driver's side of the Buick. Canine Rex was put inside of the Buick where he traced a trained odor to the rear seat area. Agent Weems brought canine Rex out the Buick and took him to the trunk area. Canine Rex jumped in the trunk and placed his nose to a plastic bag. Agent Weems rewarded canine Rex and placed him inside their assigned canine unit in order to conduct a physical search of the Buick. Prior to conducting a physical search of the Buick, Agent Weems asked TRUJILLO and SENA if they were responsible for everything in the vehicle. SENA stated that everything in the trunk of the Buick belonged to them. Agent Weems asked for and received consent from TRUJILLO and SENA to search the contents of the trunk of the Buick. During the physical search of the Buick, Agent Weems found one small bundle of a white crystal-like substance which was wrapped in black tape located in the plastic bag that canine Rex had alerted to. At this time the subjects were placed under arrest and escorted inside the checkpoint for further processing.

Inside the checkpoint, a search incident to arrest revealed 4 more bundles of white crystal-like substance concealed on TRUJILLO and SENA. TRUJILLO had 2 bundles concealed in her shoes and 1 bundle in her back pocket. SENA had 1 bundle concealed in his groin area.

A total of 5 bundles were found. The bundles were weighed by Agent Weems and witnessed by Agent Guillen. One of the bundles was tested using the Gemini. The contents of the bundle tested positive for the characteristics of methamphetamine. The 3 bundles that were concealed on Trujillo had a weight of 101.5 grams with an approximate value of \$7,296. The bundle that was concealed on SENA and the bundle in the trunk had a combined weight of 77.5 grams with an approximate value of \$5,440.

I, Drug Enforcement Administration (DEA) Special Agent (SA) Lorenzo Trevizo was contacted at approximately 12:27 a.m. on January 4, 2021, regarding the details of the case. I contacted the respective AUSA Alfred Perez and advised him of the facts and circumstances of the case. The AUSA accepted the case for federal prosecution.

SA Trevizo and SA Emerald Nguyen arrived at the Alamogordo Highway 70 Border Patrol Checkpoint at approximately 11 a.m. Upon arrival, SA Trevizo and SA Nguyen were briefed by BP Agents of the facts. SA Trevizo and SA Nguyen then proceeded to speak to Jessi TRUJILLO. SA Trevizo reminded TRUJILLO of the advise of rights form which she signed earlier (Form I-214) read to them by BPA Rivera Rodriguez, and asked if she understood her rights and still wished to speak to agents without the presence of an attorney. TRUJILLO acknowledged and agreed to answer questions without an attorney present. TRUJILLO then signed a DEA 13 Form (Advise of Rights). SAs Trevizo and Nguyen then proceeded to interview TRUJILLO.

The following is a summary of the facts of TRUJILLO's statements and shall not be considered verbatim. TRUJILLO stated that her and her husband Jeremy SENA, traveled from Roswell, NM, to Las Cruces, NM, to go gamble at the casinos and to have a little fun just the two of them. TRUJILLO stated that on early hours of Sunday morning, they both checked in at a Super 8 motel, under the name of Jessi TRUJILLO. After they checked in, TRUJILLO and SENA rested for a couple hours before they went to the local mall in Las Cruces, NM, to purchase some shoes. After TRUJILLO and SENA returned to their hotel room, both SENA and TRUJILLO noticed a trash bag inside the trash can of their room. Once TRUJILLO and SENA opened the trash bag, they both noticed that there were five bundles of drugs inside the trash bag. TRUJILLO stated that they both knew that there were drugs inside the trash bag but were not aware of the type of drugs.

TRUJILLO stated that her and SENA removed the trash bag and loaded it into the trunk of the vehicle they were driving. TRUJILLO stated that she did not want to get caught at the Border Patrol Checkpoint with drugs, that's why both her and her husband SENA decided to conceal the drugs within the inner clothing of their clothes and inside the shoes. TRUJILLO had no further information to provide to the SAs. At that moment, the interview with TRUJILLO concluded.

After the interview with TRUJILLO, SA Trevizo and SA Nguyen then proceeded to speak to Jeremy SENA. SA Trevizo reminded SENA of the advise of rights form which he signed earlier (Form I-214) read to them by BPA Rivera Rodriguez, and asked if he understood his rights and

still wished to speak to agents without the presence of an attorney. SENA declined to speak to SAs Trevizo and Nguyen. Subsequently, no interview was conducted to SENA.

At approximately 12:20 p.m., SA Trevizo and SA Nguyen had placed both SENA and TRUJILLO under arrest and departed the Border Patrol Checkpoint to officially process TRUJILLO and SENA at the Otero County Jail Facility.

A handwritten signature consisting of several loops and a long horizontal stroke.

U. S. Magistrate Judge

A handwritten signature that appears to be "Lorenzo Trevizo" in a cursive style.

DEA SA Lorenzo Trevizo

Sworn to before me this 6th Day of January 2021.